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Via ECF

Hon. John P. Cronan
U.S. District Court for the Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007
CronanNYSDChambers@nysd.uscourts.gov.

Re: Moore, et al. v. Cohen, et al., 1:19-cv-4977-ALC

Dear Judge Cronan:

Plaintiffs Chief Justice Roy Moore and his wife Kayla Moore hereby submit supplemental authority which is directly on point with regard to the allegations and legal authority relevant to their lawsuit versus the defendants.

In *Braun v. Flynt*, 726 F.2d 245 (5th Cir. 1984), a novelty entertainer who performed an act with a swimming pig at a family-oriented amusement park sued a sexually oriented men's magazine for defamation for publishing her photo in its "Chic Thrills" section. The magazine obtained authority to use the photograph by misrepresenting the nature of the magazine. *Braun* affirmed a jury finding of malice, holding that the jury may infer malice from the magazine's use of deception to obtain the photograph and then inserting the photograph of what the editors knew was a family tourist attraction "in the context of" a lewd magazine.

There is no doubt that Defendants employed not just deception but fraudulent means to publicly defame Chief Justice Roy Moore as a "pedophile," as well as maliciously inflict severe emotional distress on the judge and his wife, with all ensuing damages.

This case is attached hereto.

Plaintiffs respectfully request that this case, along with the above synopsis, which was prepared by an independent legal reporting service, be carefully considered by the Court, along with other compelling legal authority submitted by them, before this Court rules on the pending motion for summary judgment.

Respectfully,

s/ Larry Klayman

Larry Klayman, Esq.
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